

Lederer, Dave

From: Lombardo, Ginny
Sent: Thursday, September 15, 2016 1:00 PM
To: Ford, Robert; Stanley, Elaine
Cc: Acree, Steven; Lederer, Dave
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Thank you, Robert!

I question though the legitimacy of limiting the flux evaluation to TCE. Although TCE is the more mobile, the high PCB levels are co-located with TCE which will make the PCBs more mobile and some high PCB concentration are found in bedrock groundwater near the river. And the MassDEP Method 1 GW-3 standard for PCBs is 10ug/L – versus the Method 1 GW-2 standard for TCE of 5000 ug/L used in their assessment. The ambient WQC for PCBs is 0.03ug/L.

Ginny Lombardo, Chief
Remediation & Restoration II Branch
U.S. EPA Region 1 – New England
(617)918-1754

From: Ford, Robert
Sent: Wednesday, September 14, 2016 3:53 PM
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>
Cc: Acree, Steven <Acree.Steven@epa.gov>
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Ginny,

The approach to estimating flux of TCE transport to river sediments in Appendix B is about the best that can be done given the site complexity. For these calculations, one could increase the groundwater contaminant concentration, but, likewise, reasonably decrease the gradient or hydraulic conductivity. In essence, the estimated porewater concentration could reasonably be projected to cover a range (higher and lower). One would also anticipate that TCE would transport more readily through groundwater than PCBs.

It may be helpful to look at the attached diagram. I have highlighted two deep sediment zones with relatively high solid phase PCB concentrations. I have also shown the relative locations along this north-south transect of upgradient bedrock wells MW-15B, MW-34B and MW-07B. By examining the vertical distribution of PCB contaminant concentrations at sediment borings ASB-28 and ASB-29, it appears that the more problematic upland contaminant flux issue is in the more shallow overburden. All of the evaluated remedies have components that deal more directly with controlling this overburden flux.

Ultimately, it will be difficult to eliminate all potential flux from the fractured bedrock. Also, it is anticipated that some of the contamination likely extends to bedrock outside of the upland site boundary. The bedrock hotspot remedial action for OU-4 is a relatively common approach to try to reduce contaminant mass in fractured bedrock. As we had discussed in an early conversation, it is recommended that Region 1 contemplate an integrated remedy for the Acushnet River that combines some level of dredging in combination with capping to help mitigate any long-term, but more minor fluxes that may occur from bedrock.

It appears that the overburden remedial options that have been considered have taken to heart the concern of contaminant flux from the upland overburden.

Robert Ford
USEPA Office of Research & Development
26 W Martin Luther King Dr
Cincinnati, OH 45268
513.569.7501

From: Lombardo, Ginny
Sent: Wednesday, September 14, 2016 2:20 PM
To: Ford, Robert <Ford.Robert@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>
Cc: Acree, Steven <Acree.Steven@epa.gov>
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Robert and Steve-
Did you look at Appendix B Mass Flux evaluation?

Ginny Lombardo, Chief
Remediation & Restoration II Branch
U.S. EPA Region 1 – New England
(617)918-1754

From: Ford, Robert
Sent: Wednesday, September 14, 2016 1:57 PM
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>
Cc: Acree, Steven <Acree.Steven@epa.gov>
Subject: RE: Aerovox Phase III Remedial Action Plan (RAP)

Ginny and Elaine,

Attached are comments from our review of the OU3 remedial alternatives analysis. Please contact me if you have any questions or requests for clarification.

Robert Ford
USEPA Office of Research & Development
26 W Martin Luther King Dr
Cincinnati, OH 45268
513.569.7501

From: Lombardo, Ginny
Sent: Wednesday, August 31, 2016 10:21 AM
To: Wolf, Steven NAE <Steven.Wolf@usace.army.mil>; Morris, Mike (Bourne) <Mike.Morris@jacobs.com>; Ford, Robert <Ford.Robert@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>
Cc: Lederer, Dave <Lederer.Dave@epa.gov>; Barczynski, Hoshaiiah <barczynski.hoshaiah@epa.gov>; Iorio, Maryellen NAE <Maryellen.Iorio@usace.army.mil>; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>
Subject: FW: Aerovox Phase III Remedial Action Plan (RAP)

Steve, Mike and Robert-

EPA intends to transmit comment on the Aerovox Phase III RAP to MassDEP by COB September 9, 2016. Please review and **get me comments on the document by COB September 8, 2016** so that I can consolidate comments to get to the DEP on the 9th. Our comments should be limited to matters related to the impact of the alternatives evaluated and the

elements of the selected alternative on the Superfund cleanup and/or impacts to the harbor – i.e., generally our comments should relate to concerns or questions related to the OU3 remedial alternatives and OU3 selected alternative. I do not want to send DEP voluminous comments so please attempt to focus comments on significant concerns and issues. Thanks.

Kim Tisa may be issuing TSCA related comments on the Phase III directly to AVX.

Ginny Lombardo, Chief
Remediation & Restoration II Branch
U.S. EPA Region 1 – New England
(617)918-1754

From: Stanley, Elaine

Sent: Tuesday, August 23, 2016 10:11 AM

To: 'Wolf, Steven NAE' <Steven.Wolf@usace.army.mil>; 'Morris, Mike (Bourne)' <Mike.Morris@jacobs.com>; Ford, Robert <Ford.Robert@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Lederer, Dave <Lederer.Dave@epa.gov>; Barczynski, Hoshaiiah <barczynski.hoshaiiah@epa.gov>; Dickerson, Dave <dickerson.dave@epa.gov>

Cc: Iorio, Maryellen NAE <Maryellen.iorio@usace.army.mil>; Gouveia, Mark <Mark.Gouveia@jacobs.com>; Fox, Steve (New Bedford) <Steve.Fox@jacobs.com>; 'Hardesty, Al' <Al.Hardesty@jacobs.com>

Subject: Aerovox Phase III Remedial Action Plan (RAP)

FYI - Please find below the MassDEP website link to download the Former Aerovox site 21E Phase III RAP which constitutes AVX's FS/Proposed Plan. It can be found under the date 08/22/16 and is 17 mb.

<http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=4-0000601>

Please let me know if you have trouble downloading, thanks.

Elaine

Elaine Stanley
Remedial Project Manager
EPA Region 1
5 Post Office Square
Suite 100, OSRR07-4
Boston, MA 02109-3912
Office: 617-918-1332
Email: stanley.elainet@epa.gov